

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

YURI ALISHAEV, ABRAHAM JEREMIAS,  
and MORRIS JEREMIAS, individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

JPMORGAN CHASE & CO., JOHN  
EDMONDS, MICHAEL THOMAS  
NOWAK, ROBERT GOTTLIEB, and  
JOHN DOE Nos. 1-18,

Defendants.

Case No. 1:18-cv-11629-JGK

**STIPULATION AND [PROPOSED] ORDER ADJOURNING DEFENDANT  
JPMORGAN CHASE & CO.'S TIME TO RESPOND TO PLAINTIFFS' COMPLAINT**

Plaintiffs Yuri Alishaev, Abraham Jeremias, and Morris Jeremias and Defendant JPMorgan Chase & Co. ("JPMorgan") by and through their respective undersigned counsel, subject to this Court's approval, and to the reservation of rights contained in paragraph 2 below, agree and stipulate as follows:

**RECITALS**

WHEREAS, Plaintiffs commenced the above action in this District by the filing of a summons and complaint on December 12, 2018;

WHEREAS, JPMorgan accepted service of the complaint by email on January 2, 2019;

WHEREAS, plaintiffs in certain related cases have moved for consolidation of related actions (the "motion") pursuant to FED. R. CIV. P. 42 and requested that the Court set a schedule for the filing of a consolidated complaint and for Defendants to answer, move to dismiss, or otherwise respond to the consolidated complaint;

WHEREAS, the Court has ordered that any oppositions to the motion be filed by January 7, 2019, and any replies be filed by January 21, 2019, with a conference to be held on February 1, 2019;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED as follows:

1. JPMorgan's time to respond to the complaint is hereby adjourned *sine die*.
2. Except as to the defense of insufficiency of service of process in this action, no defense of JPMorgan, including without limitation defenses based upon lack of personal jurisdiction, is prejudiced or waived by JPMorgan's executing, agreeing to, or filing this Stipulation.
3. This Stipulation may be executed in separate counterparts, and counterparts may be executed in facsimile form, each of which shall be an original.

Dated: January 2, 2019  
New York, New York

WEISSLAW LLP

/S/ Mark D. Smilow

Mark D. Smilow  
1500 Broadway, Suite 1601  
New York, NY 10036  
Telephone: (212) 682-3025  
Email: msmilow@weisslawllp.com

*Counsel for Plaintiffs Yuri Alishaev, Abraham  
Jeremias, and Morris Jeremias*

SULLIVAN & CROMWELL LLP

/S/ Amanda Flug Davidoff

Amanda Flug Davidoff  
1700 New York Avenue, N.W., Suite 700  
Washington, D.C. 20006-5215  
Telephone: (202) 956-7500  
Email: davidoffa@sullcrom.com

*Counsel for Defendant JPMorgan Chase & Co.*

**SO ORDERED.**

DATED:

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New York, NY

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HON. JOHN G. KOELTL  
United States District Judge